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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CASE NO. CR-15-00205 WHA
)	
v.)	
)	
JAQUAN DESHAWN TAYLOR,)	STIPULATION AND PROPOSED ORDER
)	
Defendant.)	
)	
)	
)	

The Government respectfully submits this Stipulation and Proposed Order to memorialize the exclusion of time under the Speedy Trial Act from April 21, 2015, until the next status hearing in the above-captioned matter on May 5, 2015, at 2:00 p.m. The parties hereby stipulate and agree to the following:

1. The parties appeared before the Court on April 21, 2015 for a status hearing and the matter was continued until May 5, 2015, for setting of motions or a change of plea.

2. The parties now formalize their request for a continuance of the matter to May 5, 2015, at 2:00 p.m., for settings and respectfully submit that the period from April 21, 2015 through and including May 5, 2015, be excluded from the Speedy Trial Act computation pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) because failure to grant the requested continuance would unreasonably deny

1 defendant the reasonable time necessary for effective preparation, taking into account the exercise of
2 due diligence. Specifically, the parties represent that defense counsel's need to review discovery and to
3 conduct necessary investigation supports the requested continuance.

4 IT SO STIPULATED.

5 DATED: April 22, 2015

MELINDA HAAG
United States Attorney

7 By: /s/


LAURIE KLOSTER GRAY
Assistant United States Attorney

9 DATED: April 22, 2015

/s/
GEOFFREY A. HANSEN
Assistant Federal Public Defender
Counsel for Jaquan Deshawn Taylor

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13 FOR THE REASONS SET FORTH ABOVE, time under the Speedy Trial Act shall be excluded
14 from April 21, 2015 through May 5, 2015.

15
16 DATED: April 27, 2014


HON. WILLIAM H. ALSUP
United States District Judge